

would be blocked from initiating PCS services in more than 40% of the New York area without microwave relocation. Under the 2 Lic/40 MHz allocation structure, by contrast, Licensee A could initiate PCS services at more than 88% of the New York area without microwave relocation.

Six different spectrum availability maps are provided in each tabbed section. The first three maps demonstrate spectrum availability for Licensee A under each of the three allocation structures assuming no microwave links have been relocated. The second three maps demonstrate spectrum availability for Licensee A under each of the three allocation structures assuming three microwave links have been relocated.

To examine a particular map, read the title block in the lower right hand corner. The allocation structure used for each map is listed in the title block, above the printing date and the market name. The map legend is in the upper left hand corner of the map. The legend indicates the color coding scheme used to depict spectrum availability at each grid point on the map.²⁰ Purple indicates areas with no spectrum available for PCS Licensee A. Blue indicates areas with 0.1 to 10 MHz of spectrum available for Licensee A. Green indicates areas with 10.1 to 20 MHz of spectrum available for Licensee A. Yellow indicates areas with more than 20 MHz of spectrum available for Licensee A. Also listed at the bottom of the legend is the number of "worst case" microwave paths relocated for the particular map.

In each tabbed section, the following exhibits are provided in order:

²⁰The color coding scheme is the same across all maps.

Chart 1:

Percentage of area with no spectrum available for each PCS licensee under each allocation structure with no microwave links relocated.

Chart 2:

Percentage of area with no spectrum available for each PCS licensee under each allocation structure with 0, 1, 2 and 3 microwave links relocated.

Map 1:

Licensee A spectrum availability, 2 Lic/40 MHz, no microwave links relocated.

Map 2:

Licensee A spectrum availability, 3 Lic/30 MHz, no microwave links relocated.

Map 3:

Licensee A spectrum availability, 5 Lic/20 MHz, no microwave links relocated.

Map 4:

Licensee A spectrum availability, 2 Lic/40 MHz, three microwave links relocated.

Map 5:

Licensee A spectrum availability, 3 Lic/30 MHz, three microwave links relocated.

Map 6:

Licensee A spectrum availability, 5 Lic/20 MHz, three microwave links relocated.

B. Areas With No Spectrum Available For PCS

As discussed above, in order to expedite the initiation of PCS services, it is necessary to adopt an allocation structure that minimizes areas with no spectrum available for PCS. Although the tables at the end of the report text provide the percentages of areas with no spectrum available for each licensee, it is useful to average these percentages

across licensees to obtain a direct comparison of the three allocation structures.

The following table allows a comparison of spectrum availability averaged across all licensees:

Percentage of Areas with No Spectrum Available for PCS

No microwave links relocated

	2 Lic/40 MHz	3 Lic/30 MHz	5 Lic/20 MHz
	% Averaged Across All Licensees	% Averaged Across All Licensees	% Averaged Across All Licensees
New York	11.8	20.0	29.7
Los Angeles	25.8	30.6	46.3
Chicago	20.8	30.1	43.2
Washington, DC	1.0	4.7	9.6
Philadelphia	4.8	11.0	18.8
Detroit	6.0	10.2	16.3
Boston	3.7	6.7	13.1
Dallas	13.4	18.0	32.1
Houston	19.8	25.7	36.5
Miami	10.2	12.6	26.3
San Francisco	17.9	24.7	35.9
Average	12.3	17.6	28.0

Averaged across all licensees in all eleven markets, with no microwave links relocated, only 12.3% of the area has no spectrum available for PCS under the 2 Lic/40 MHz allocation structure. This number increases to 17.6% for the 3 Lic/30 MHz allocation structure and to 28.0% for the 5 Lic/20 MHz allocation structure.

Examining the variability of spectrum across licensees under a given allocation structure also allows a comparison of the fairness of the allocation structures. For example, the worst case variability of spectrum availability for the 2 Lic/40 MHz allocation structure is in Dallas. Examining the first table following the report text (and the first chart in the Dallas tabbed section) reveals that the

percentage of area with no spectrum available for Licensee A (2 Lic/40 MHz, no microwave links relocated) is only 8.5%, while the percentage is 18.4% for Licensee B. The average is 13.4% with a standard deviation of 4.9%. For the 5 Lic/20 MHz case in the same city, the percentage of area with no spectrum available for Licensee B is only 15.0% while this figure goes to 49.9% for Licensee D. This is a difference in spectrum availability of nearly 35% of the Dallas area. The average is 32.1% with a standard deviation of 11.4%.

The following table allows a comparison of the standard deviations from the average percentage of area with no spectrum available averaged across all licensees:

Standard Deviation from Average			
Percentage of Areas with No Spectrum Available for PCS			
No microwave links relocated			
	2 Lic/40 MHz	3 Lic/30 MHz	5 Lic/20 MHz
	Standard Deviation %	Standard Deviation %	Standard Deviation %
New York	0.0	4.5	9.1
Los Angeles	2.1	3.5	6.9
Chicago	4.8	7.4	8.7
Washington, DC	1.0	0.3	4.4
Philadelphia	1.4	6.8	8.2
Detroit	2.4	2.4	5.4
Boston	3.3	3.4	6.8
Dallas	4.9	4.5	11.4
Houston	1.6	3.8	6.5
Miami	1.5	2.5	5.9
San Francisco	2.5	2.1	4.5
Average	2.3	3.7	7.1

Averaged across all licensees in all eleven markets, with no microwave links relocated, the standard deviation under the 2 Lic/40 MHz allocation structure is only 2.3%. This number

increases to 3.7% for the 3 Lic/30 MHz allocation structure and to 7.1% for the 5 Lic/20 MHz allocation structure.

C. Average Spectrum Availability

Averaging spectrum availability can obscure extremes that should not be ignored in policy decisions. For example, if 40 MHz is available for PCS in one area and zero MHz is available in another, the average availability is 20 MHz. This average availability appears to indicate that enough spectrum has been allocated to allow the immediate initiation of PCS services, but hides the fact that microwave relocations are required to free up spectrum in the area with no spectrum available. However, average spectrum availability does allow a comparison of the allocation structures.

The computer program utilized in this report averaged spectrum availability across all grid points in each market. The following table shows the average amount of spectrum available for PCS in each market for each spectrum allocation:

Average Spectrum Availability for PCS

No microwave links relocated

	2 Lic/40 MHz	3 Lic/30 MHz	5 Lic/20 MHz
	MHz	MHz	MHz
New York	24.8	18.5	12.2
Los Angeles	18.2	13.5	9.0
Chicago	19.3	14.7	9.8
Washington, DC	34.7	26.2	17.5
Philadelphia	28.9	21.2	14.1
Detroit	29.3	22.5	15.2
Boston	33.9	25.4	16.9
Dallas	24.3	18.3	12.2
Houston	21.2	16.2	11.1
Miami	25.3	19.3	12.8
San Francisco	22.7	17.1	11.3
Average	25.7	19.4	12.9

Averaged across all licensees in all eleven markets, with no microwave links relocated, the 2 Lic/40 MHz allocation structure yields 25.7 MHz of spectrum available for PCS. This number drops to 19.4 MHz for the 3 Lic/30 MHz allocation structure and to 12.9 MHz for the 5 Lic/20 MHz allocation structure. For all three allocation structures, on the average, between 64% and 65% of the spectrum allocated to each PCS licensee is available for PCS.

Although the 2 Lic/40 MHz allocation structure provides on average 18.2 MHz of available spectrum for PCS (assuming no microwave links relocated), Licensee A has no spectrum available at 23.7% of the area. Under the 5 Lic/20 MHz allocation structure, only 9.0 MHz of spectrum is available for PCS (assuming no microwave links relocated). Under this structure, Licensee A has no spectrum available at 40.5% of the area. Comparing the first and third maps from the Los Angeles tabbed section reveals that only 141 blocks of a total of 595 blocks (526 grid points minus 30 over-water points) are purple under the 2 Lic/40 MHz allocation structure while 241 of 595 blocks are purple under the 5 Lic/20 MHz structure.

IX. Conclusions

This report was prepared to provide information on PCS spectrum availability in the 1850-1990 MHz band shared with OFS microwave. The impact on spectrum availability of the amount of spectrum allocated for each PCS licensee is demonstrated in charts, maps and tables. APC committed its resources to this project with the belief that policy decisions on PCS allocations should be based on spectrum availability facts and not on speculation or anecdotal evidence.

Three broad conclusions can be drawn from the data presented herein;

1. In a shared spectrum environment, reducing the amount of spectrum allocated to each PCS licensee increases the percentage of areas with no spectrum available.

2. In a shared spectrum environment, reducing the amount of spectrum allocated to each PCS licensee and increasing the number of licensees per market, increases the variability of spectrum availability between licensees.

3. In a shared spectrum environment, on the average, only a percentage of the spectrum allocated to each PCS licensee is actually available for PCS services.

The data presented herein demonstrate the magnitude of the differences between the allocation structures in these three areas.

The technical parameters utilized in the study are based upon sound engineering assumptions and thus the data provided herein are accurate for the stated purposes.

Percentage of Areas with No Spectrum Available for PCS

No "worst case" microwave links relocated

	Licensee A	Licensee B	Licensee C	Licensee D	Licensee E
New York					
2 Lic/40 MHz	11.8	11.8			
3 Lic/30 MHz	23.7	13.6	22.6		
5 Lic/20 MHz	40.4	17.8	20.1	37.3	32.9
Los Angeles					
2 Lic/40 MHz	23.7	27.9			
3 Lic/30 MHz	27.6	28.6	35.5		
5 Lic/20 MHz	40.5	55.5	37.8	53.1	44.7
Chicago					
2 Lic/40 MHz	16.0	25.6			
3 Lic/30 MHz	21.1	29.9	39.3		
5 Lic/20 MHz	40.9	33.5	48.7	57.1	36.0
Washington, D.C.					
2 Lic/40 MHz	0.0	2.1			
3 Lic/30 MHz	4.8	5.0	4.2		
5 Lic/20 MHz	18.4	6.9	8.0	7.8	6.7
Philadelphia					
2 Lic/40 MHz	6.2	3.4			
3 Lic/30 MHz	7.0	5.3	20.6		
5 Lic/20 MHz	13.0	14.1	9.6	28.3	29.0
Detroit					
2 Lic/40 MHz	8.4	3.6			
3 Lic/30 MHz	12.4	11.2	6.9		
5 Lic/20 MHz	22.9	20.0	18.2	12.4	8.1
Boston					
2 Lic/40 MHz	0.4	6.9			
3 Lic/30 MHz	4.0	4.6	11.4		
5 Lic/20 MHz	14.8	0.4	17.1	20.4	13.0
Dallas					
2 Lic/40 MHz	8.5	18.4			
3 Lic/30 MHz	17.1	13.0	23.8		
5 Lic/20 MHz	36.6	15.0	30.4	49.9	28.6
Houston					
2 Lic/40 MHz	18.2	21.4			
3 Lic/30 MHz	25.8	21.0	30.2		
5 Lic/20 MHz	37.8	38.2	34.2	46.1	26.2
Miami					
2 Lic/40 MHz	8.7	11.7			
3 Lic/30 MHz	11.7	16.0	10.2		
5 Lic/20 MHz	27.1	17.8	36.2	25.7	24.5
San Francisco					
2 Lic/40 MHz	20.4	15.3			
3 Lic/30 MHz	27.4	24.5	22.3		
5 Lic/20 MHz	44.4	33.3	33.7	31.8	36.2

Percentage of Areas with No Spectrum Available for PCS

One "worst case" microwave link relocated

	Licensee A	Licensee B	Licensee C	Licensee D	Licensee E
New York					
2 Lic/40 MHz	9.9	3.4			
3 Lic/30 MHz	18.7	5.6	17.4		
5 Lic/20 MHz	29.8	3.6	5.9	25.1	20.1
Los Angeles					
2 Lic/40 MHz	16.6	25.5			
3 Lic/30 MHz	24.2	22.0	33.8		
5 Lic/20 MHz	34.6	46.4	30.4	50.3	38.2
Chicago					
2 Lic/40 MHz	14.0	23.1			
3 Lic/30 MHz	16.2	26.4	33.2		
5 Lic/20 MHz	22.6	23.9	37.6	46.2	25.6
Washington, D.C.					
2 Lic/40 MHz	0.0	2.1			
3 Lic/30 MHz	0.8	5.0	0.8		
5 Lic/20 MHz	7.8	0.2	8.0	0.8	0.6
Philadelphia					
2 Lic/40 MHz	0.6	3.4			
3 Lic/30 MHz	7.0	4.0	16.8		
5 Lic/20 MHz	5.0	0.6	2.4	22.4	17.4
Detroit					
2 Lic/40 MHz	4.8	0.0			
3 Lic/30 MHz	5.3	6.5	0.3		
5 Lic/20 MHz	15.5	10.5	10.3	0.3	0.0
Boston					
2 Lic/40 MHz	0.4	4.9			
3 Lic/30 MHz	2.3	0.0	4.8		
5 Lic/20 MHz	6.9	0.0	0.0	6.5	4.4
Dallas					
2 Lic/40 MHz	3.4	14.6			
3 Lic/30 MHz	9.3	6.9	16.8		
5 Lic/20 MHz	26.7	6.4	19.5	39.2	16.0
Houston					
2 Lic/40 MHz	16.2	19.5			
3 Lic/30 MHz	21.4	17.1	28.3		
5 Lic/20 MHz	32.6	34.1	28.6	44.0	23.0
Miami					
2 Lic/40 MHz	6.4	11.4			
3 Lic/30 MHz	6.4	12.2	5.5		
5 Lic/20 MHz	11.1	16.0	21.9	19.0	9.6
San Francisco					
2 Lic/40 MHz	18.7	13.8			
3 Lic/30 MHz	24.8	20.9	12.4		
5 Lic/20 MHz	40.8	23.3	25.7	19.7	19.7

Percentage of Areas with No Spectrum Available for PCS

Two "worst case" microwave links relocated

	Licensee A	Licensee B	Licensee C	Licensee D	Licensee E
New York					
2 Lic/40 MHz	3.8	2.9			
3 Lic/30 MHz	8.6	4.5	11.3		
5 Lic/20 MHz	17.1	3.2	5.0	13.8	15.1
Los Angeles					
2 Lic/40 MHz	13.4	20.7			
3 Lic/30 MHz	16.6	19.2	28.1		
5 Lic/20 MHz	26.2	38.3	25.2	42.4	36.0
Chicago					
2 Lic/40 MHz	7.6	19.0			
3 Lic/30 MHz	9.1	23.6	28.9		
5 Lic/20 MHz	10.2	17.0	27.2	41.9	19.8
Washington, D.C.					
2 Lic/40 MHz	0.0	0.8			
3 Lic/30 MHz	0.0	1.8	0.8		
5 Lic/20 MHz	3.7	0.2	4.8	0.8	0.6
Philadelphia					
2 Lic/40 MHz	0.6	2.1			
3 Lic/30 MHz	2.1	1.1	9.9		
5 Lic/20 MHz	0.0	0.6	2.4	14.9	6.7
Detroit					
2 Lic/40 MHz	1.2	0.0			
3 Lic/30 MHz	0.3	5.0	0.0		
5 Lic/20 MHz	4.1	4.8	8.6	0.0	0.0
Boston					
2 Lic/40 MHz	0.0	0.0			
3 Lic/30 MHz	0.0	0.0	2.1		
5 Lic/20 MHz	0.0	0.0	0.0	0.9	1.1
Dallas					
2 Lic/40 MHz	2.2	6.6			
3 Lic/30 MHz	4.8	1.8	13.6		
5 Lic/20 MHz	12.3	6.1	5.3	32.3	11.0
Houston					
2 Lic/40 MHz	15.0	17.8			
3 Lic/30 MHz	18.2	15.7	25.0		
5 Lic/20 MHz	25.9	31.0	20.6	39.0	17.1
Miami					
2 Lic/40 MHz	6.4	6.7			
3 Lic/30 MHz	6.4	7.9	2.9		
5 Lic/20 MHz	1.5	16.0	14.3	12.2	9.6
San Francisco					
2 Lic/40 MHz	11.2	10.2			
3 Lic/30 MHz	23.1	16.3	6.8		
5 Lic/20 MHz	35.0	21.8	21.1	12.4	11.9

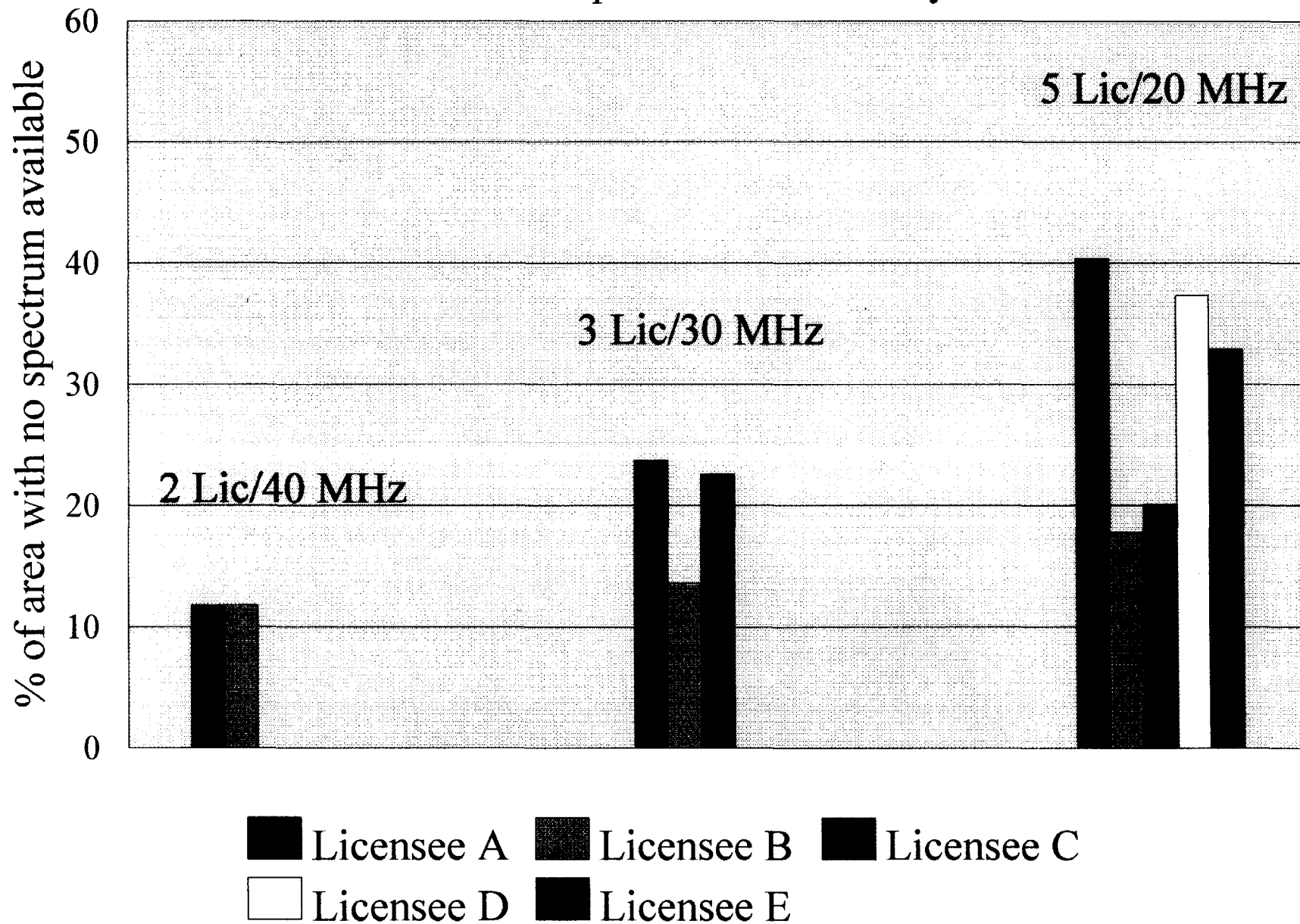
Percentage of Areas with No Spectrum Available for PCS

Three "worst case" microwave links relocated

	Licensee A	Licensee B	Licensee C	Licensee D	Licensee E
New York					
2 Lic/40 MHz	1.4	1.6			
3 Lic/30 MHz	3.2	2.7	1.8		
5 Lic/20 MHz	6.1	1.4	3.2	1.8	14.0
Los Angeles					
2 Lic/40 MHz	11.3	16.1			
3 Lic/30 MHz	13.6	16.0	22.9		
5 Lic/20 MHz	22.7	29.7	20.2	32.8	29.1
Chicago					
2 Lic/40 MHz	7.6	16.5			
3 Lic/30 MHz	2.0	21.8	26.1		
5 Lic/20 MHz	2.0	11.9	22.6	36.0	12.4
Washington, D.C.					
2 Lic/40 MHz	0.0	0.3			
3 Lic/30 MHz	0.0	0.3	0.0		
5 Lic/20 MHz	1.8	0.2	0.5	0.0	0.2
Philadelphia					
2 Lic/40 MHz	0.0	1.4			
3 Lic/30 MHz	0.6	0.6	4.8		
5 Lic/20 MHz	0.0	0.6	1.9	5.6	1.6
Detroit					
2 Lic/40 MHz	0.0	0.0			
3 Lic/30 MHz	0.3	0.5	0.0		
5 Lic/20 MHz	4.1	1.5	5.7	0.0	0.0
Boston					
2 Lic/40 MHz	0.0	0.0			
3 Lic/30 MHz	0.0	0.0	0.0		
5 Lic/20 MHz	0.0	0.0	0.0	0.0	1.1
Dallas					
2 Lic/40 MHz	0.0	1.1			
3 Lic/30 MHz	0.0	1.0	6.2		
5 Lic/20 MHz	0.0	5.0	0.8	20.0	7.4
Houston					
2 Lic/40 MHz	13.0	15.0			
3 Lic/30 MHz	15.7	13.9	23.8		
5 Lic/20 MHz	17.8	27.5	17.3	35.2	13.4
Miami					
2 Lic/40 MHz	1.5	5.5			
3 Lic/30 MHz	1.5	5.5	1.2		
5 Lic/20 MHz	1.5	8.2	5.5	12.0	9.3
San Francisco					
2 Lic/40 MHz	10.9	8.3			
3 Lic/30 MHz	16.3	12.1	4.9		
5 Lic/20 MHz	27.9	16.7	15.0	9.7	6.1

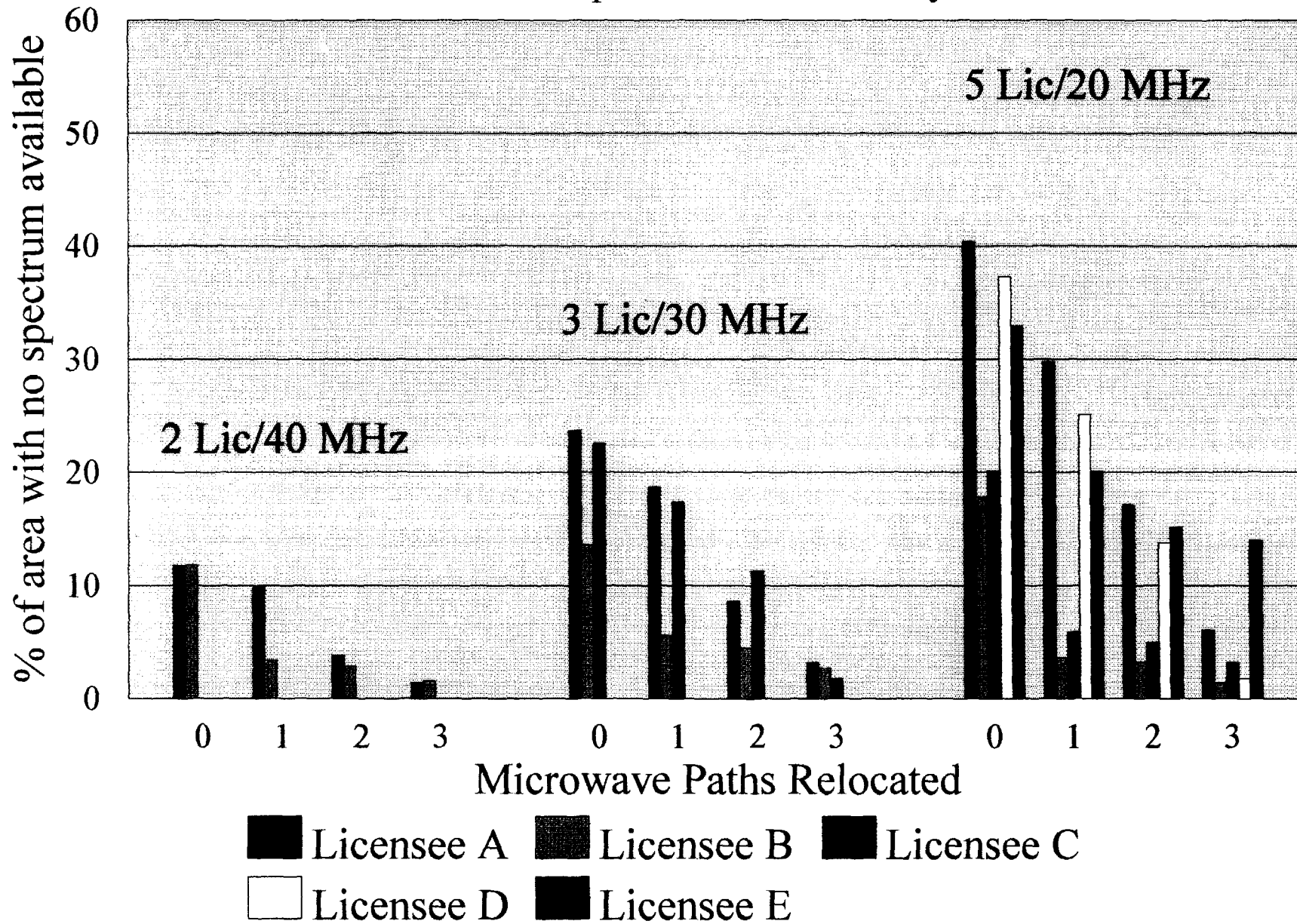
New York

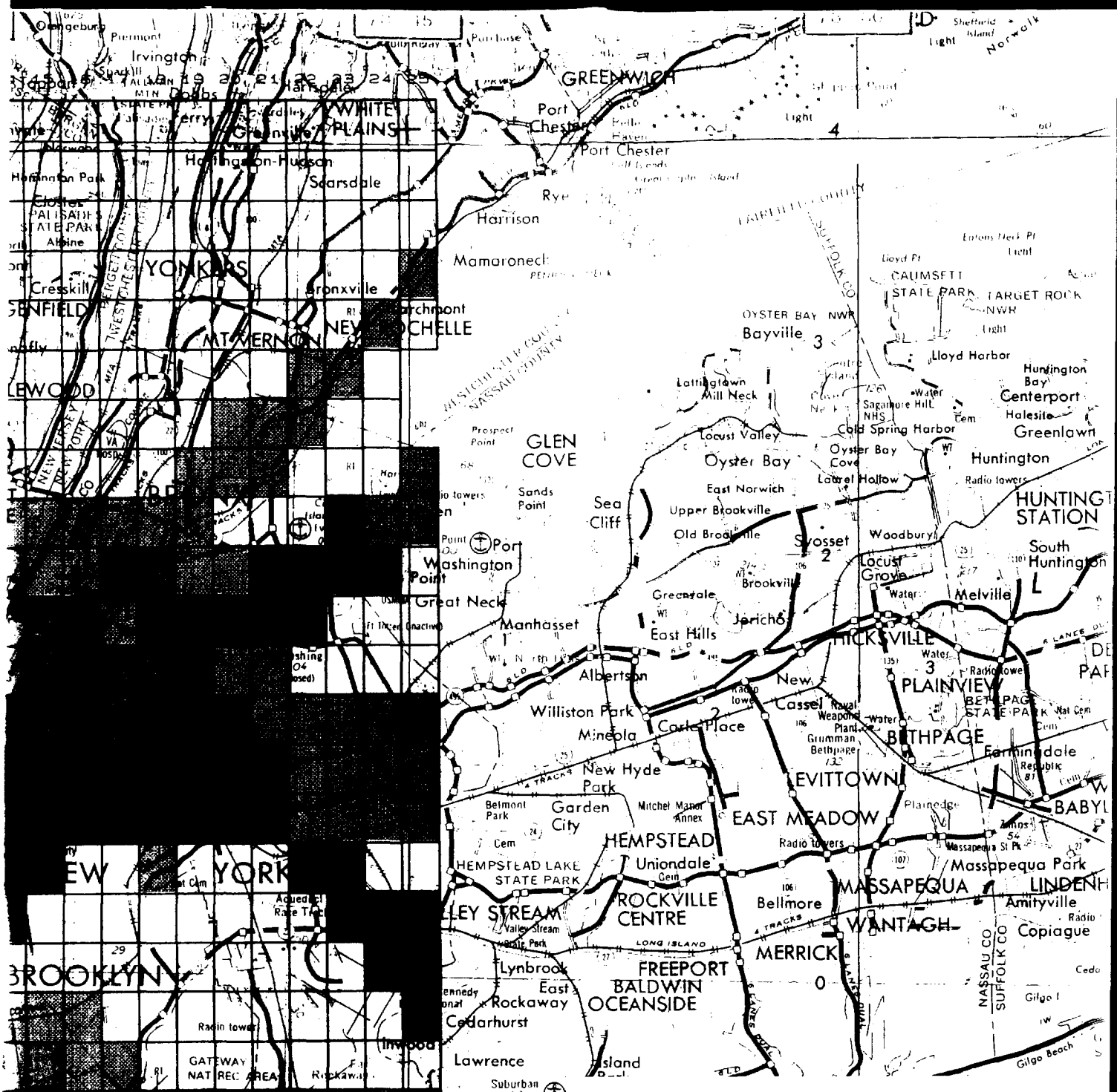
PCS Spectrum Availability



New York

PCS Spectrum Availability





AMERICAN PERSONAL COMMUNICATIONS
 LONG ISLAND
 Licensee A Spectrum Availability

2 Lic/Mrkt and 40 MHz/Lic

New York

10/19/92

NEW YORK
 QUEENS COUNTY
 INMOUTH COUNTY
 NEW JERSEY



41 00

LEGEND

Available
Spectrum

Color

>20 MHz -

10.1 - 20 MHz -

0.1 - 10 MHz -

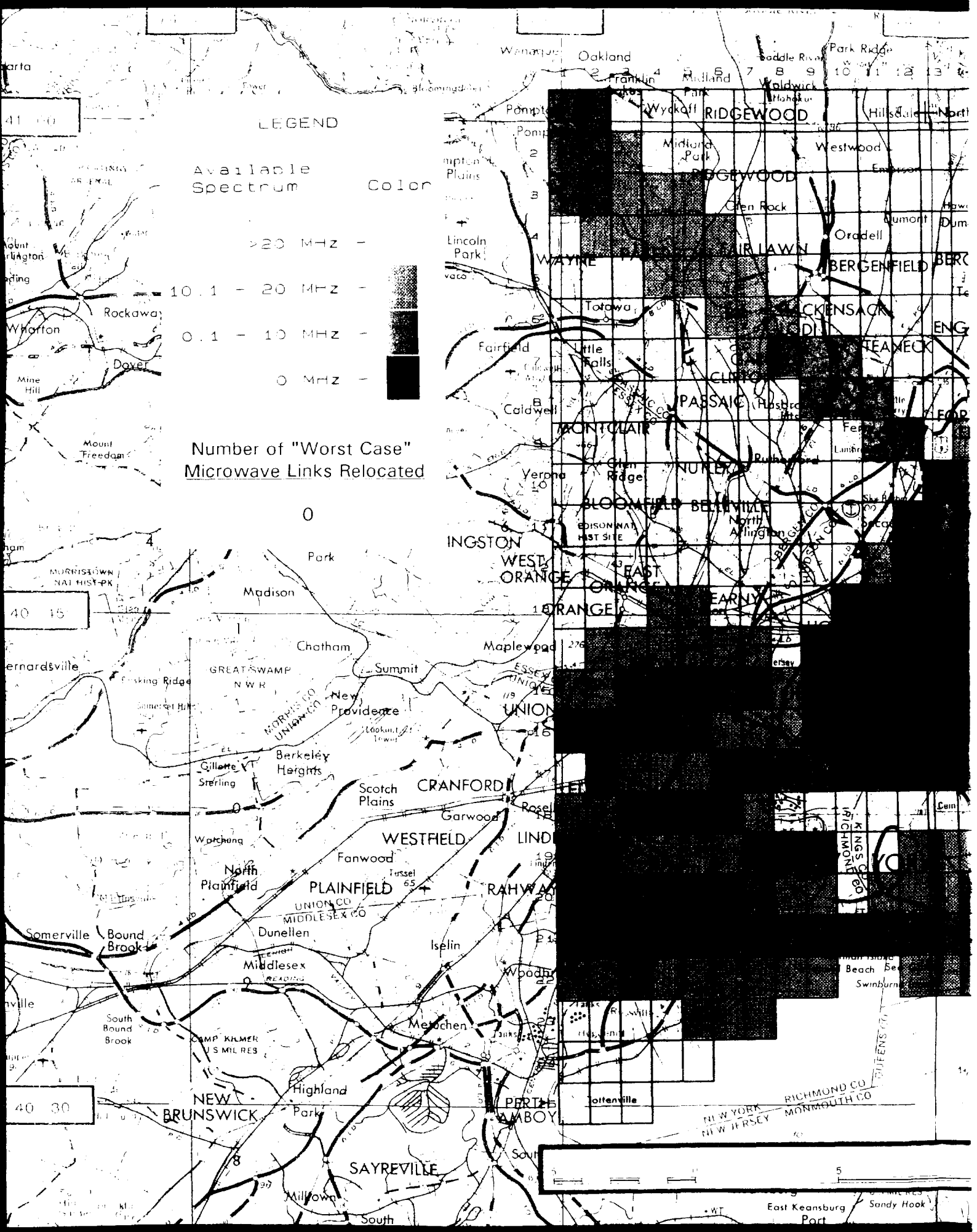
0 MHz -

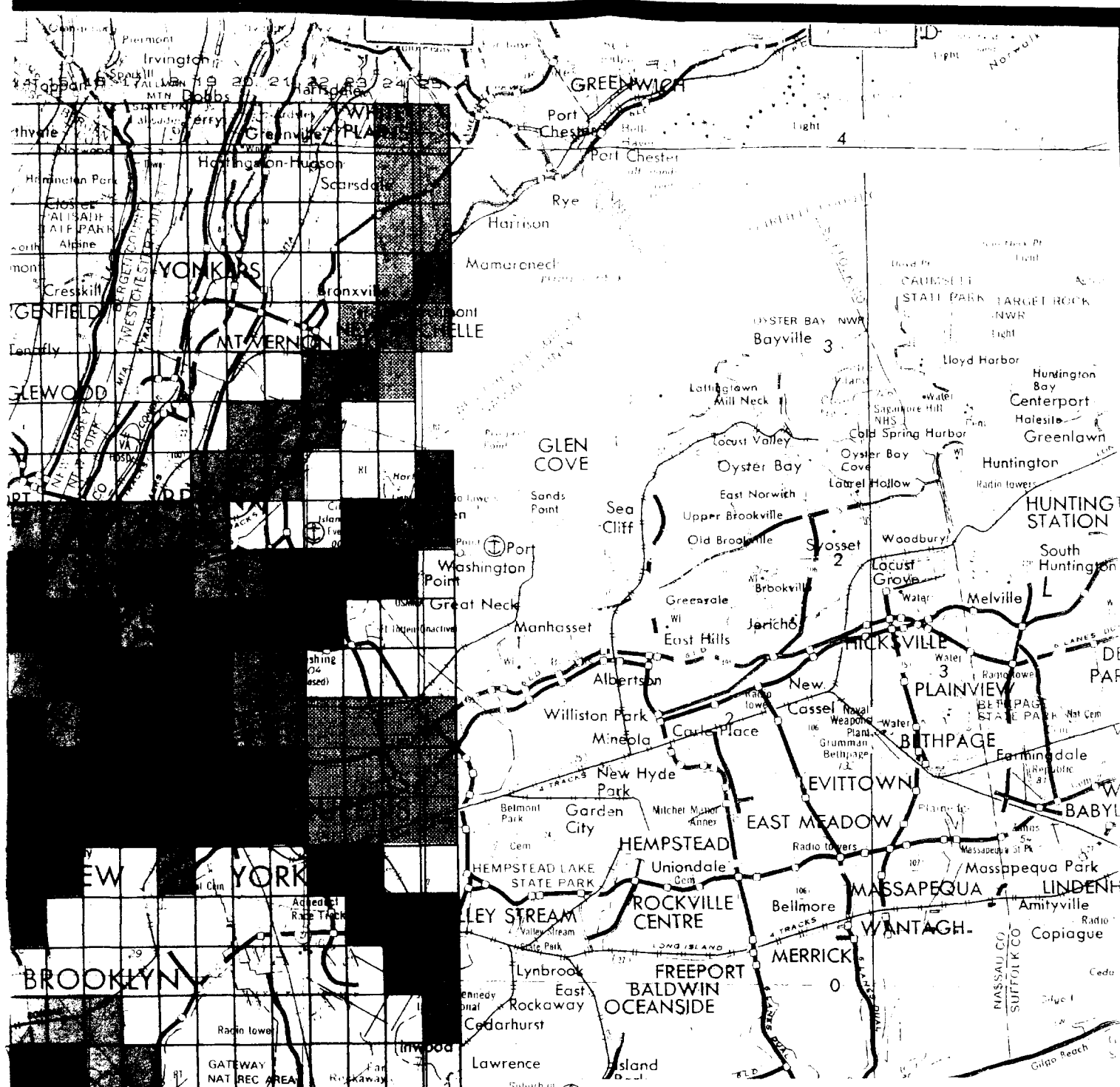
Number of "Worst Case"
Microwave Links Relocated

0

40 15

40 30





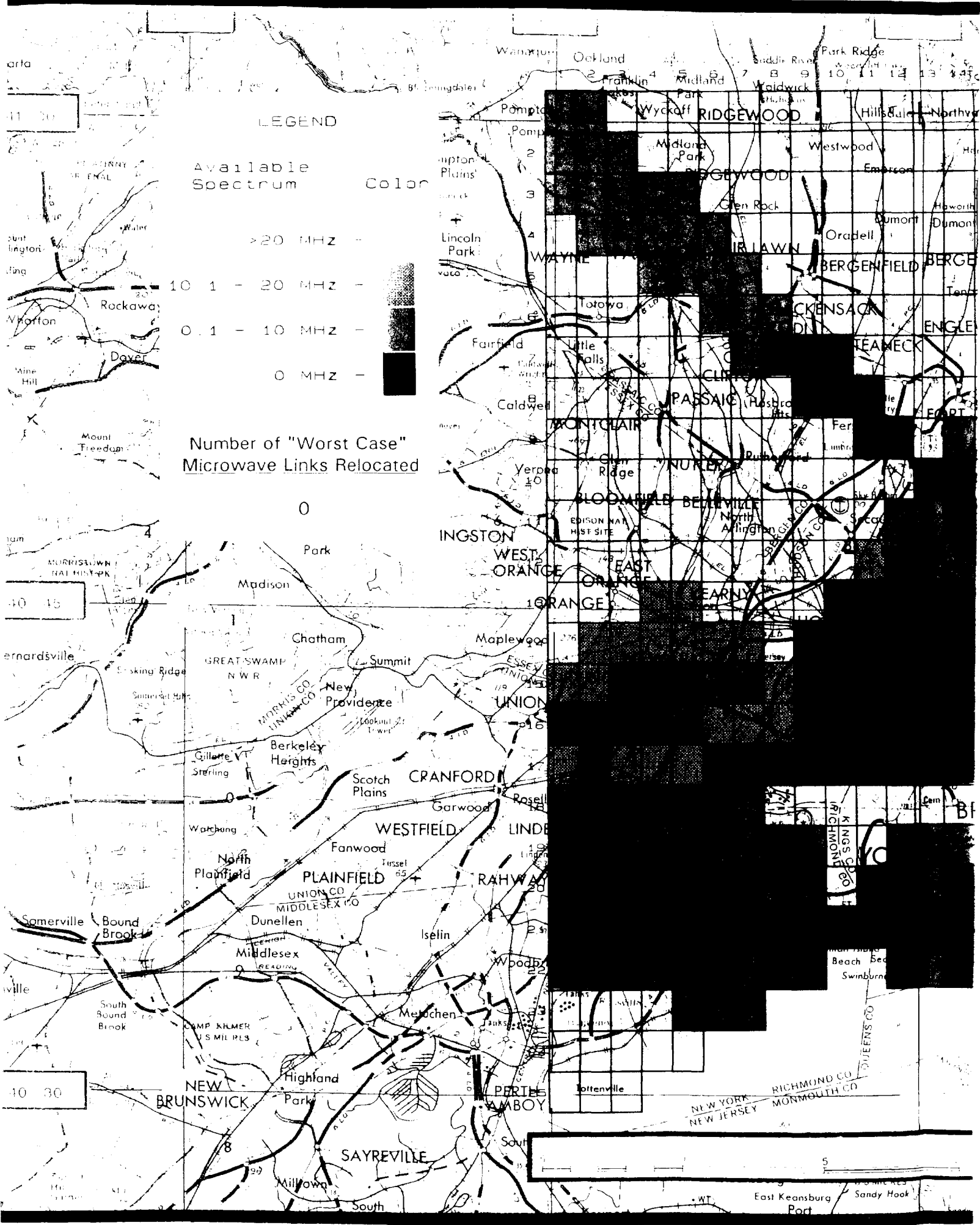
AMERICAN PERSONAL COMMUNICATIONS
 LONG ISLAND
 Licensee A Spectrum Availability

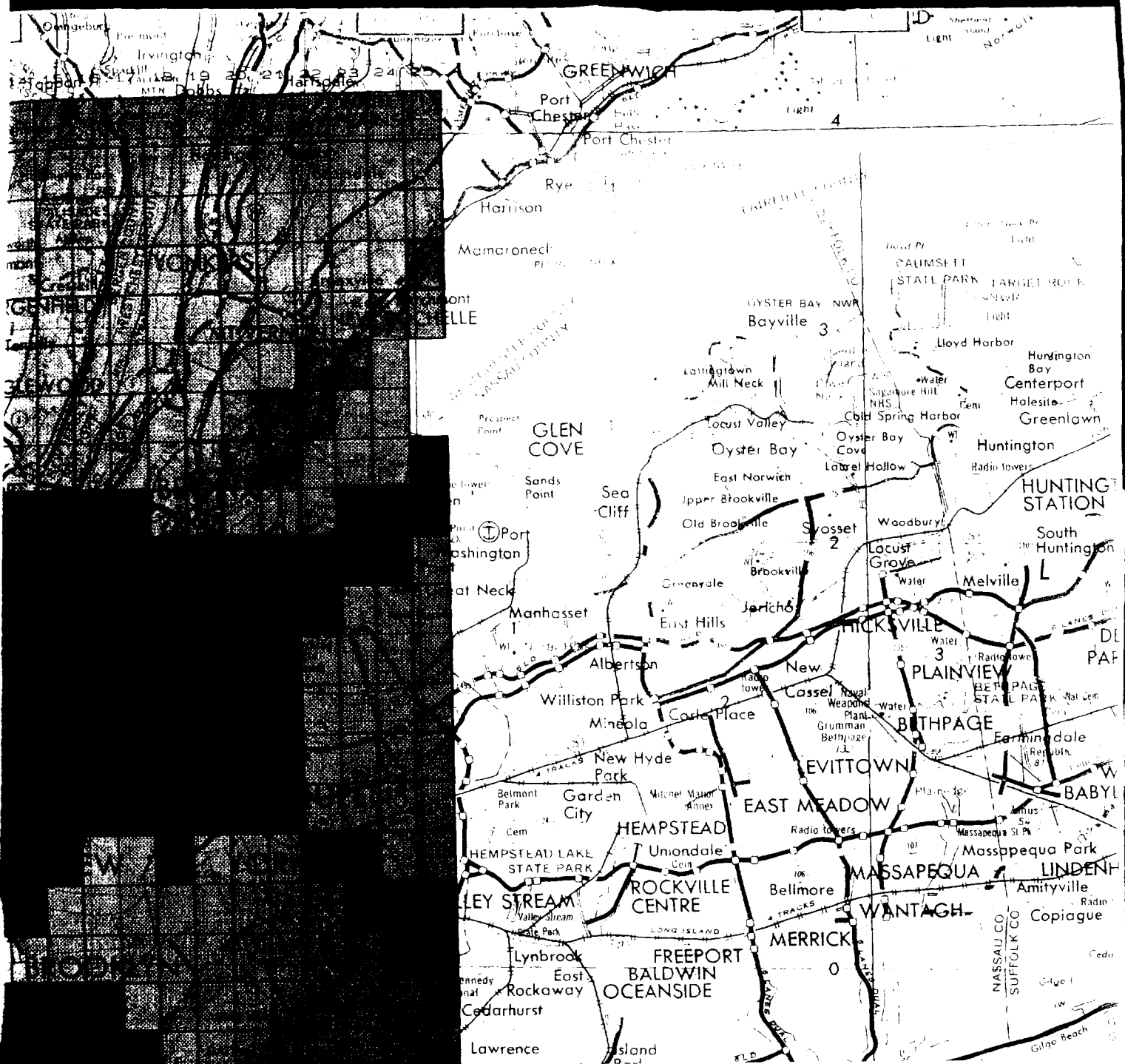
3 Lic/Mrkt and 30 MHz/Lic

New York

10/19/92

15 20 Miles





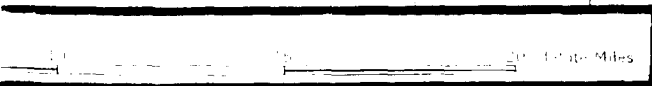
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 Licensee A Spectrum Availability

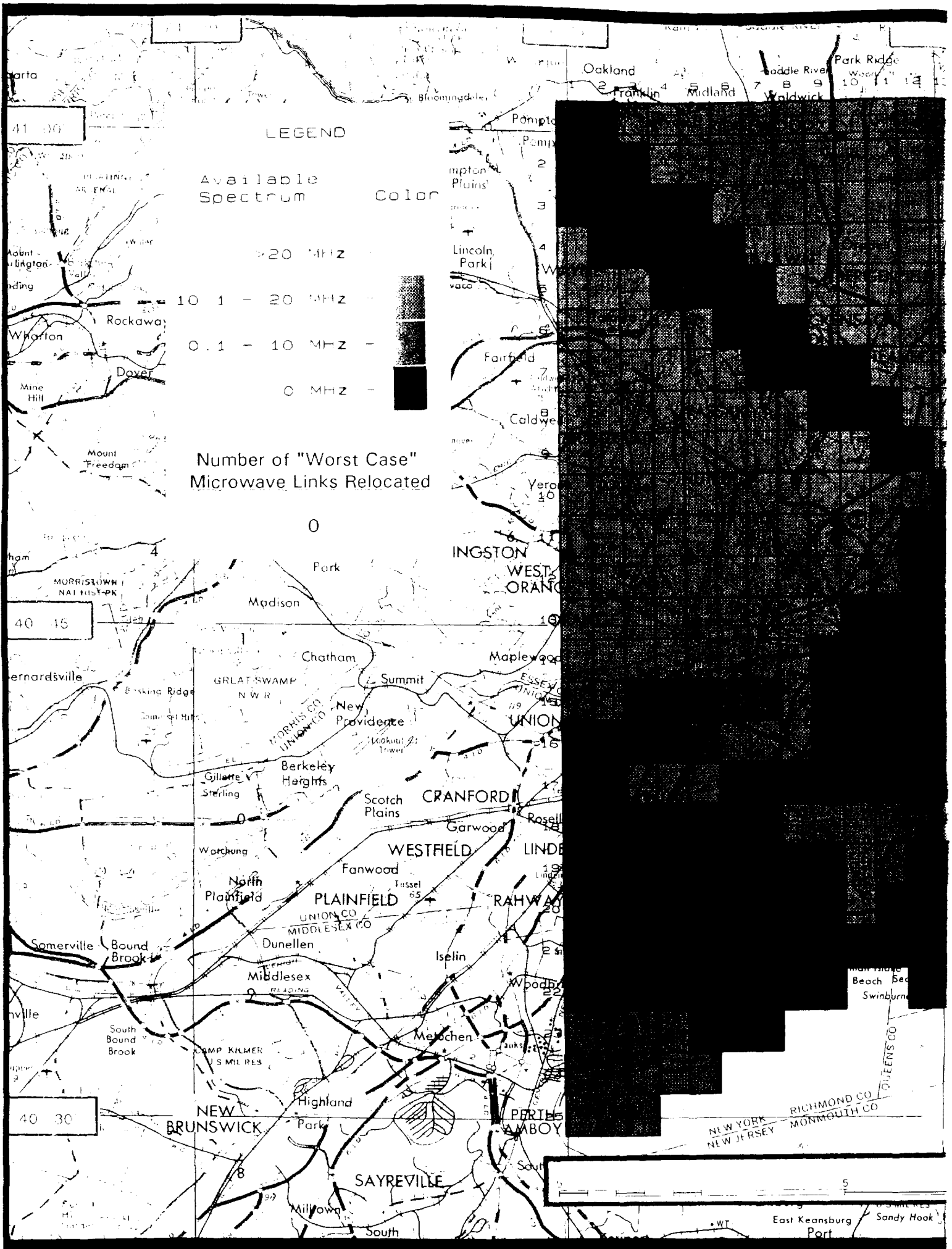
5 Lic/Mrkt and 20 MHz/Lic

New York

10/19/92

NEW YORK
 WESTCHESTER COUNTY
 PUTNAM COUNTY
 NEW ARSENY





LEGEND

Available Spectrum

Color

>20 MHz

10 1 - 20 MHz

0.1 - 10 MHz

0 MHz

Number of "Worst Case"
Microwave Links Relocated

0

Park

Madison

Chatham

Summit

New Providence

Berkeley Heights

Scotch Plains

CRANFORD

WESTFIELD

PLAINFIELD

RAHWAY

Highland

NEW BRUNSWICK

SAYREVILLE

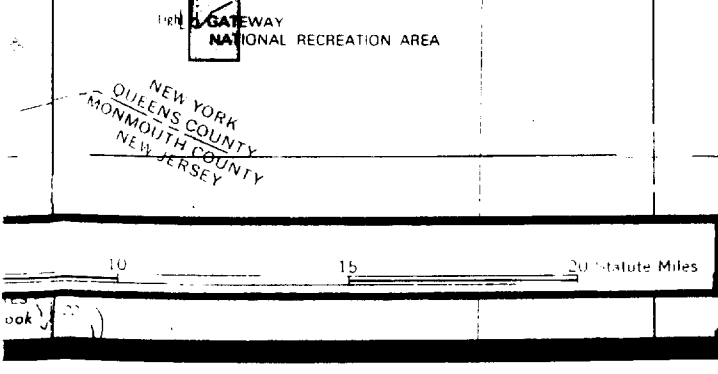
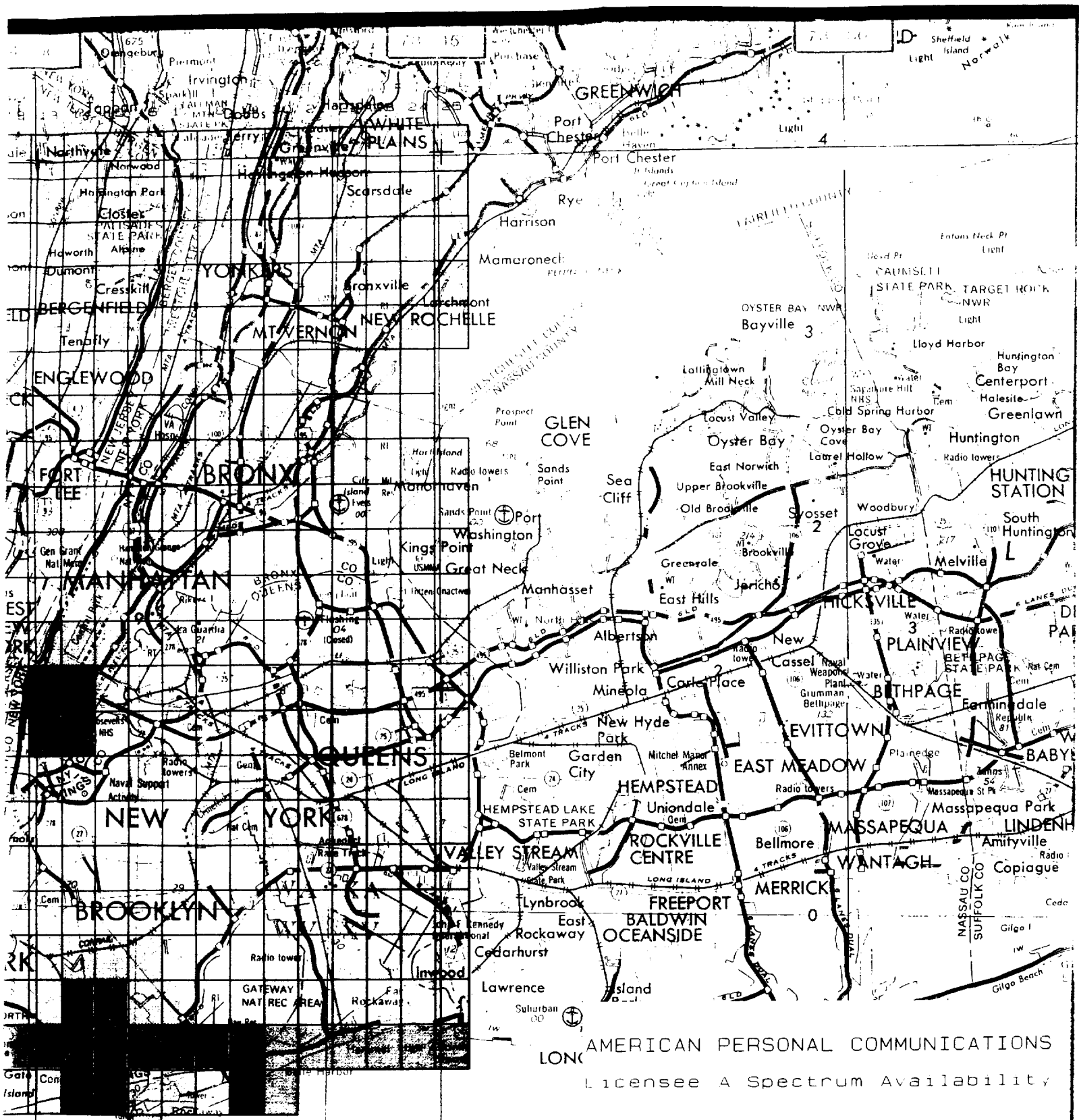
NEW YORK
NEW JERSEY

RICHMOND CO

MONMOUTH CO

East Keansburg
Port

Sandy Hook

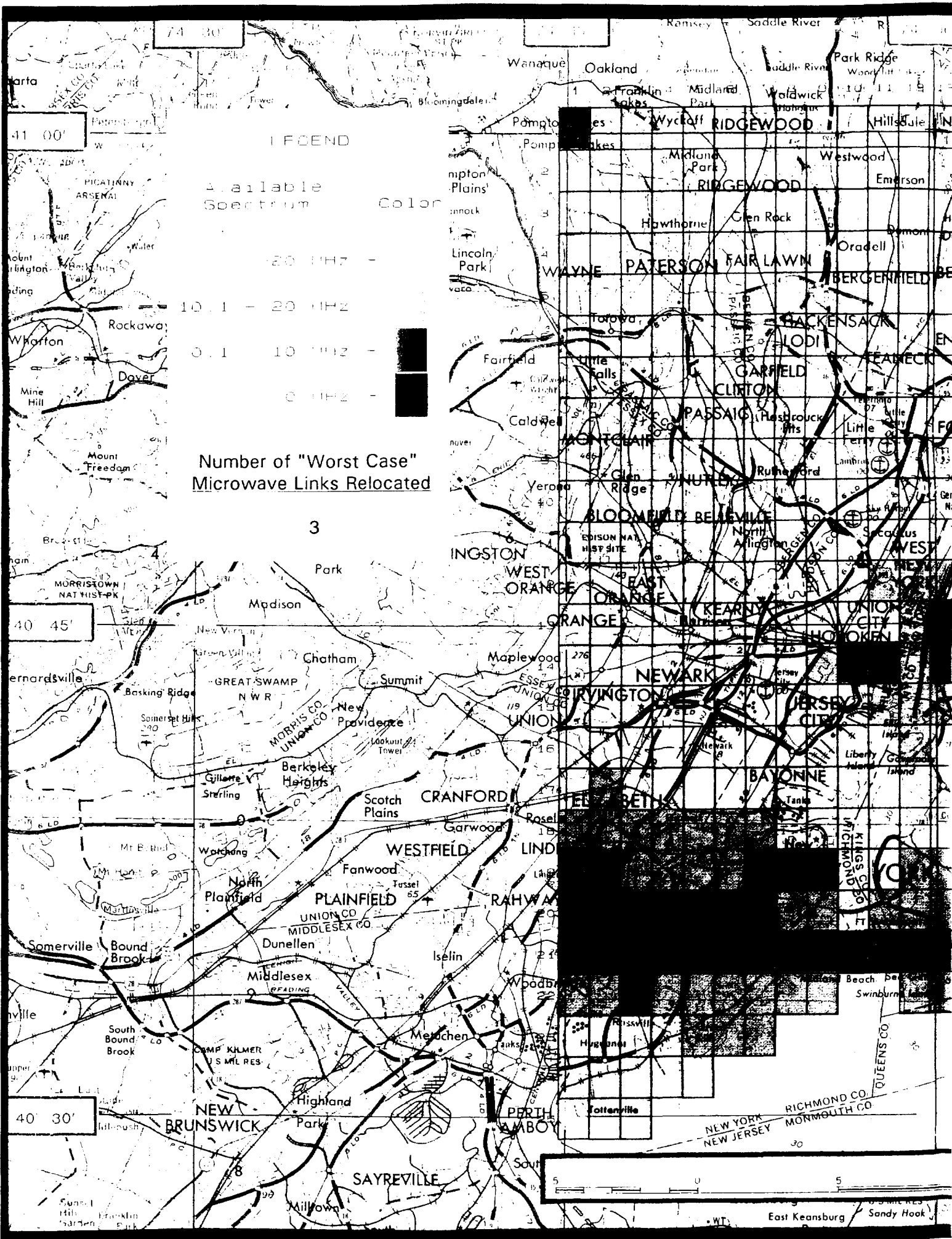


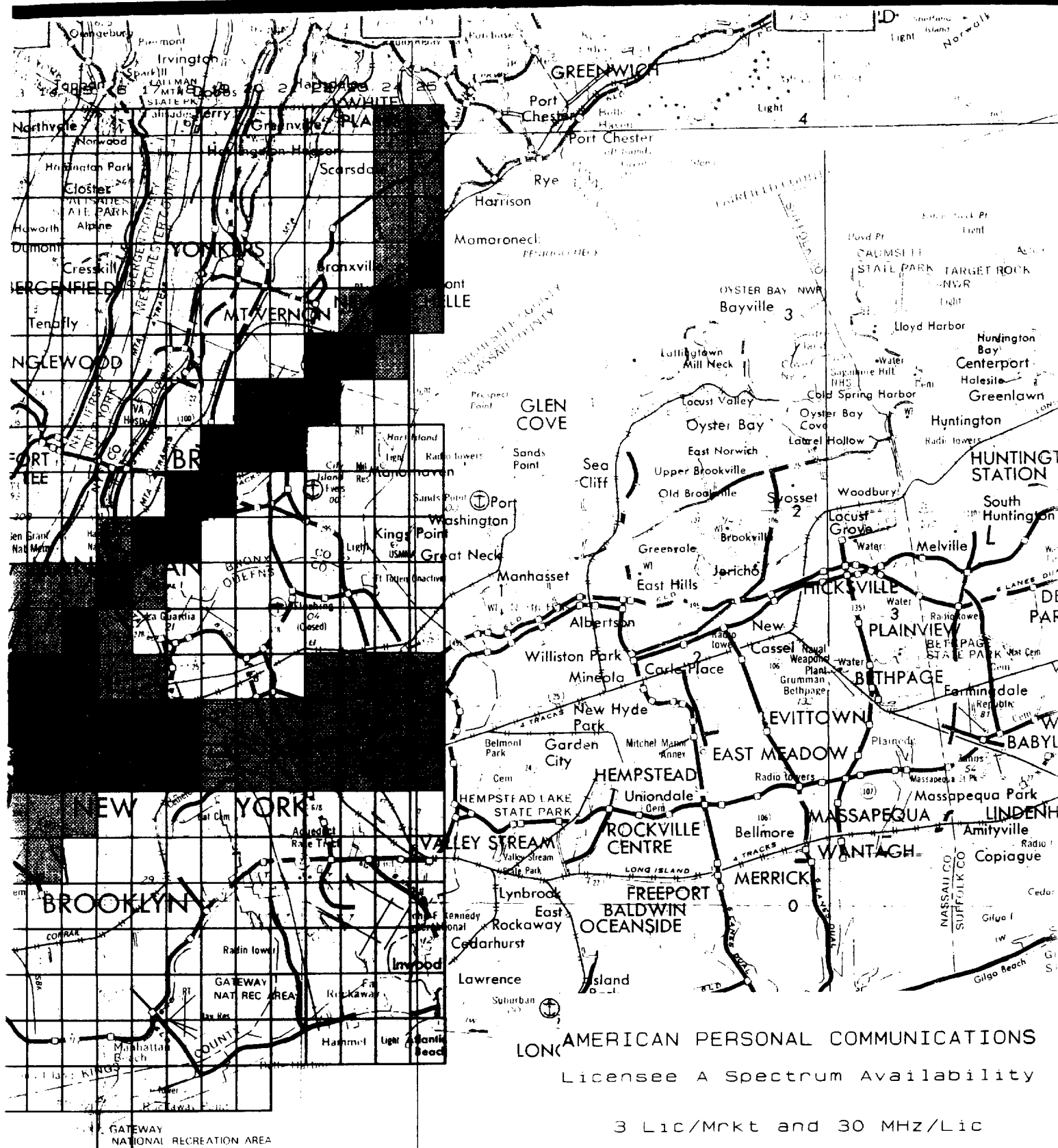
AMERICAN PERSONAL COMMUNICATIONS
 Licensee A Spectrum Availability

2 Lic/Mkt and 40 MHz/Lic

New York

10/29/92



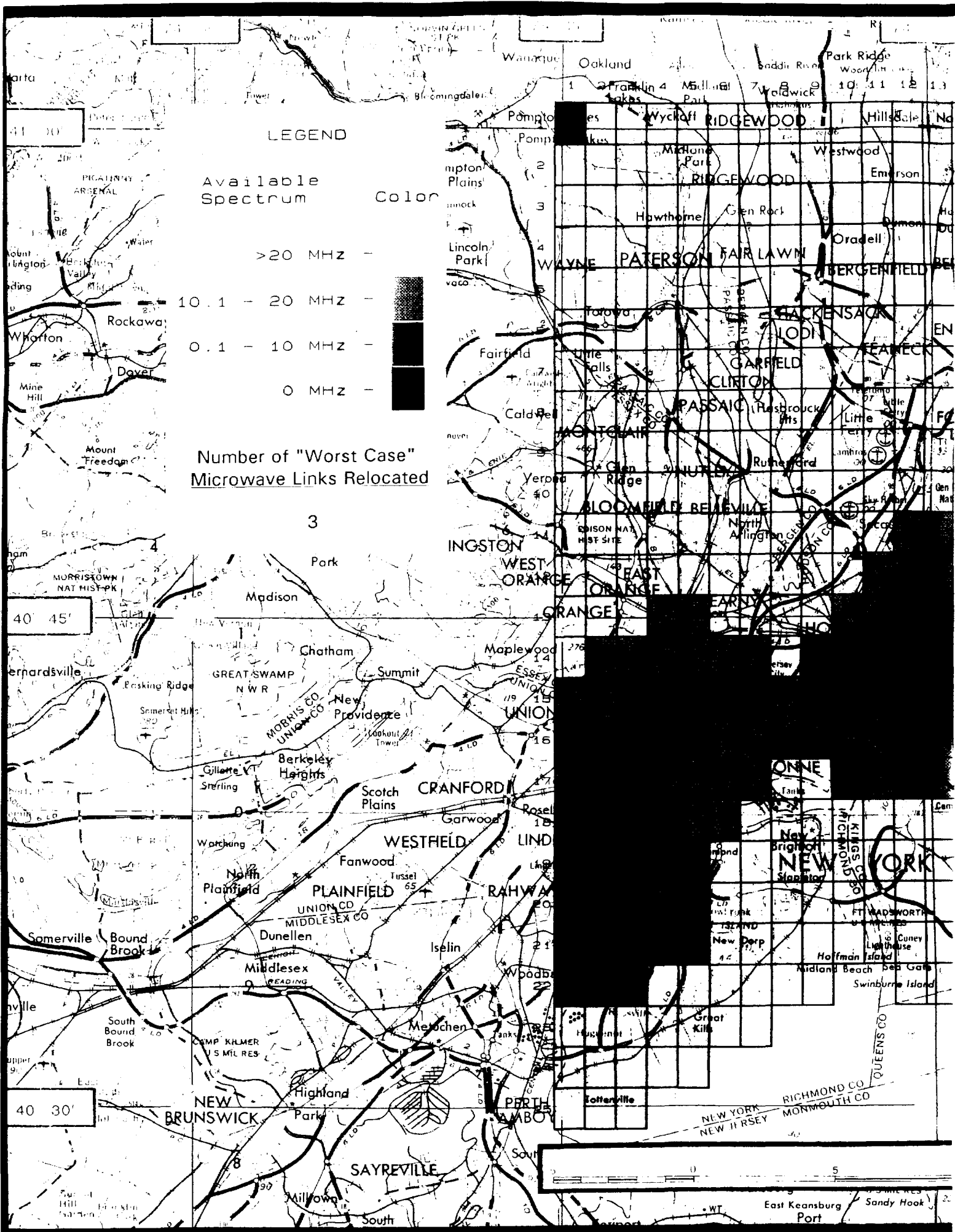


LONG ISLAND AMERICAN PERSONAL COMMUNICATIONS Licensee A Spectrum Availability

3 Lic/Mrkt and 30 MHz/Lic

New York

10/29/92



LEGEND

Available Spectrum

Color

>20 MHz -

10.1 - 20 MHz -

0.1 - 10 MHz -

0 MHz -

Number of "Worst Case"
Microwave Links Relocated

3

Park

Madison

Chatham

Summit

New Providence

Berkeley Heights

Scotch Plains

CRANFORD

WESTFIELD

Fanwood

PLAINFIELD

Dunellen

Middlesex

Highland

Park

SAYREVILLE

Milltown

South

INGSTON

WEST ORANGE

ORANGE

Maplewood

ESSEX

UNION

CRANFORD

Garwood

RAHWAY

Iselin

Woodbridge

Hopkinton

Perth Amboy

South

South

South

South

South

Pompton

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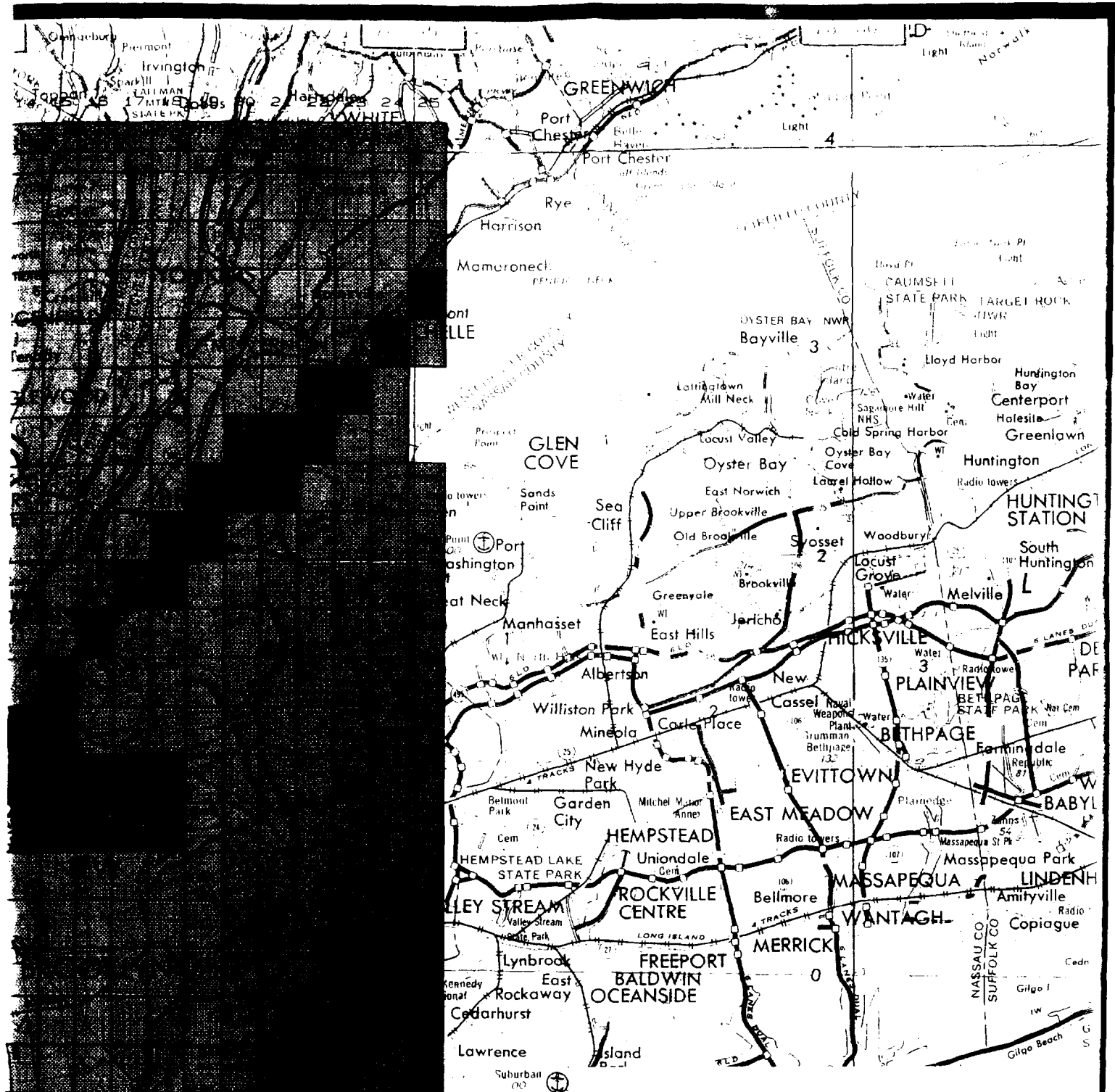
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5 Lic/Mrkt and 20 MHz/Lic

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